

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**RUTH V. BRIGGS,**

**Plaintiff,**

**v.**

**TEMPLE UNIVERSITY,**

**Defendant.**

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**CIVIL ACTION NO. 16-00248**

**JOINT MOTION FOR EXTENSION OF TIME**

Plaintiff Ruth V. Briggs (“Plaintiff”) and Defendant Temple University – of the Commonwealth System of Higher Education (“Defendant”) (collectively, the “Parties”), by and through counsel, jointly move this Court for an extension of all deadlines established in the Court’s Scheduling Order of April 4, 2016 (Doc. No. 8). The Parties generally seek an extension of the following deadlines in the April 4, 2016 Order and specifically request that the following new deadlines be established:

1. All factual discovery shall be completed on or before September 26, 2016;
2. All dispositive motions, if any, shall be filed on or before October 10, 2016; and
3. If the parties do not file any dispositive motions, the parties’ Joint Pretrial Order shall be filed on or before October 24, 2016. If dispositive motions are filed, the parties’ Joint Pretrial Order shall be filed within fourteen (14) days after the Court’s disposition of the dispositive motions.

The Parties seek the relief requested in this motion for the following reasons:

1. Plaintiff’s counsel is currently scheduled to commence a two-week trial in the Superior Court of New Jersey in *Mitch Williams v. The MLB Network, Inc.* (Docket No. L-3675-14)

on June 27, 2016 and many pretrial issues have arisen in connection with that trial which have impacted the scheduling of depositions.

2. An extension of the factual discovery deadline will be helpful to the parties in the event that certain witnesses are on vacation during the summer months.
3. The delay will not unreasonably extend the trial or resolution of this case.
4. Defendant's counsel authorized Plaintiff's counsel to submit this motion as an uncontested joint motion and to file this joint motion on behalf of the Parties.

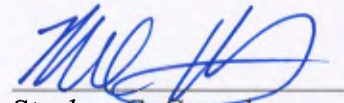
Therefore, Plaintiff and Defendant respectfully request that the Court grant this motion and extend the deadlines originally set forth in this Court's order of April 4, 2016 to the new dates specified herein and to enter the proposed order.

Respectfully submitted,

**CONSOLE LAW OFFICES LLC**

Dated: June 15, 2016

By:



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